LAW OFFICE OF RAYMOND M. RADULSKI Legal Arts Building, Suite 301 1225 N. King Street Wilmington, DE 19801

Telephone Fax (302) 658-9388 July 2, 2008 (302) 658-5378

Geoffrey Grivner, Esquire Assistant United States Attorney U. S. Department of Justice 1007 Orange Street, Suite 700 Wilmington, DE 19899-2046

> Re: United States v. Courtney Murray Criminal Action No. 08-87-JJF

Dear Mr. Grivner:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, and <u>Brady v. Maryland</u>, 373 U.S. 83 (1963), I am requesting that you provide me with the following information within the possession, custody, or control of the Government or the existence of which is known or by the exercise of due diligence could become known to the Government.

- 1. A copy of all written or recorded statements or confessions made by the defendant(s), or by any juvenile or adult co-defendant(s), including a copy of all notes recorded by any police officer or other agent contemporaneous to any oral statements or confessions made by the defendant(s) or co-defendant(s).
- 2. A written statement relating to the substance of any oral statements made by the defendant(s) and not recorded as set for in 1., above, which the Government intends to offer in evidence which were made by the defendant(s), in response to interrogation by any person then known to the defendant(s) to be a Government agent.
- 3. A copy of all written reports of any scientific analyses conducted in connection with the above-captioned case, including a listing of any analyses for which a report was not filed.
- 4. A copy of all written reports of any physical or psychological examination of the defendant(s) or of any alleged victim.
- 5. A copy of any memorialized testimony of the defendant(s) before the Federal Grand Jury relating to the above case.

Geoffrey Grivner, Esquire Page Two July 2, 2008

In addition to the above, I would appreciate your providing the following:

- 6. A statement as to the approximate time and location of the alleged offense(s) in the above case.
- 7. In addition, a statement as to the date, the approximate time and location of the defendant(s)' arrest, the name(s) of the arresting officer(s) or other Government agent(s), and the name of the agency which he (they) are associated.
- 8. Copies of all executed warrants of arrest and all executed search warrants relating to the above-captioned case, including all affidavits and warrant returns.
 - 9. A statement as to the involvement of any confidential informant(s), if applicable.
- 10. The names of the police officers or other Government agents involved in the investigation of the above case and the agencies with which they are associated.
- 11. A statement as to the date, time and location of any and all line-ups, photographic or show-up identifications (or attempted identifications) of the defendant(s) in connection with the above case.
- 12. An opportunity pursuant to <u>Jencks v. U.S.</u>, 353 U.S. 657 (1957), to review reports and statements, whether oral, written or recorded, made by persons who will testify at trial, regardless of whether the individual used the statement or report to prepare for examination. I would appreciate it if you could share this information with me prior to trial in order to avoid delay prior to cross-examination.
- 13. A disclosure as to the utilization of any electronic or other mechanical surveillance device, if applicable.
- 14. An opportunity to inspect all items which the Government intends to offer in evidence, but not limited to, any documents, photographs, weapons, clothing, diagrams, or similar tangible objects.
 - 15. A copy of the prior criminal record of the defendant(s)
 - 16. A copy of grand jury testimony relating to this case.

Geoffrey Grivner, Esquire Page Three July 2, 2008

Very truly yours,

/s/ Raymond M. Radulski Raymond M. Radulski

RMR:sr

cc: Clerk, United States District Court

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

Plaintiff,

:

v.

: Cr. Action No. 08-87-JJF

COURTNEY MURRAY,

:

Defendant.

CERTIFICATE OF SERVICE

I hereby certify that on the date listed below, I electronically filed Defendant COURTNEY MURRAY's Brady Letter with the Clerk of Court using CM/ECF which will send notification of such filing to the following: AUSA Geoffrey Grivner, 1007 Orange Street, 7th Floor, Wilmington, Delaware.

/S/ Raymond M. Radulski
RAYMOND M. RADULSKI, ESQUIRE
ID #332
Legal Arts Building, Suite 301
1225 North King Street
Wilmington, DE 19801
(302) 658-9388
rradulskiesq@aol.com
Attorney for Defendant
COURTNEY MURRAY

Dated: July 2, 2008